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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

FILED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

J-M MANUFACTURING COMPANY,
INC. a Delaware corporation,

Plaintiff,

vs.

MCDERMOTT WILL & EMERY, a
Business Entity, form unknown; and
DOES 1 through 100, inclusive

Defendants.

CASE NO. LACV 11-0006 PSG (EA)

NOTICE OF RELATED CASES

Defendant McDermott Will & Emery LLP ("MWE") hereby files this Notice of Related Cases concurrently with its Notice of Removal of this action, which was originally filed in the Los Angeles County Superior Court.

The First Amended Complaint filed by plaintiff J-M Manufacturing Company, Inc. ("J-M") alleges two separate claims for legal malpractice which arises out of different sets of transactions or occurrences: (1) a claim of transactional malpractice allegedly arising out of MWE's failure to discover that some of the patents J-M allegedly acquired did not comply with specifications; and (2) a claim of litigation malpractice arising out of the production of documents in the case of United States ex. Rel. John Hendrix v. J-M

1 Manufacturing Company, Inc., Case No. CV 06-00055 GW PJWx ("the qui tam case"),
2 which is pending before this Court.

3 Because the second malpractice claim alleges litigation malpractice in the qui tam
4 case pending before this Court, this matter appears to arise from the same or a closely
5 related transaction, happening or event as the qui tam case, to call for the determination of
6 the same or substantially related or similar questions of law or fact as the qui tam case,
7 and to raise the prospect of a substantial duplication of labor if this case and the qui tam
8 case were heard by different judges.

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10 Dated: August 12, 2011

McLEOD, MOSCARINO, WITHAM &
FLYNN, LLP

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12 By: 

13 John M. Moscarino
14 Attorneys for Defendant McDermott Will &
Emery LLP
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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action; my business address is 707 Wilshire Boulevard, Suite 5000, Los Angeles, CA 90012.


On **August 12, 2011**, I served the foregoing document described as **NOTICE OF RELATED CASES** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope(s) addressed as follows:

Rafael Bernardino, Jr.
Stanley L. Friedman
Hobson Dongog Bernardino & Davis, LLP
333 S. Hope St., Suite 4000
Los Angeles, CA 90071

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with United States postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on **August 12, 2011**, at Los Angeles, California.



Andrew Torres